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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

WALTER VALLINE,  
  
Plaintiff,  
  
vs.  
  
KILOLO KIJAKAZI,  
Acting Commissioner of Social Security,  
  
Defendant.

)  
) Case No.: 3:22-cv-00088-CLB  
)  
) **UNOPPOSED MOTION FOR EXTENSION OF**  
) **TIME**  
)  
) **(FIRST REQUEST)**

1 Defendant, the Acting Commissioner of Social Security, through the undersigned counsel, hereby  
2 requests a 14-day extension of time to respond to Plaintiff's Complaint, which is currently due on or before  
3 May 31, 2022. The new proposed deadline is June 14, 2022.

4 This is Defendant's first request for an extension of time. Good cause exists for this extension  
5 because in the course of reviewing the certified administrative record for completeness, the undersigned  
6 attorney noticed an issue that she believes could necessitate remand. Defendant's counsel is in the  
7 process of conferring with her client to determine whether this matter can be resolved by settlement. The  
8 additional requested time will allow for settlement discussions with Plaintiff's counsel once the  
9 undersigned has conferred with her client, and if the matter cannot be resolved, Defendant will file an  
10 answer and the certified administrative record as soon as practicable. Defendant's counsel will endeavor  
11 to complete these tasks as soon as possible. This request is made in good faith and with no intention to  
12 unduly delay the proceedings, and counsel apologizes for any inconvenience.

13 On May 18, 2022, the undersigned conferred with Plaintiff's counsel, who has no opposition to the  
14 requested extension.

15 It is therefore respectfully requested that Defendant be granted a 14-day extension of time to file a  
16 response to Plaintiff's Complaint, through and including June 14, 2022.

17  
18 Dated: May 18, 2022

19 JASON M. FRIERSON  
United States Attorney

20 /s/ Allison J. Cheung  
21 ALLISON J. CHEUNG  
Special Assistant United States Attorney

22  
23 IT IS SO ORDERED:

24   
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: May 19, 2022

**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Mark Barrett  
Mark@mydisabilityattorney.com  
Attorney for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 18, 2022

/s/ Allison J. Cheung  
ALLISON J. CHEUNG  
Special Assistant United States Attorney